IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

AYA HEALTHCARE, INC.,

Plaintiff,

v.

Case No. 3:24-cv-00390-B

RALPH DE LA TORRE and MEDICAL PROPERTIES TRUST, INC.,

Defendants.

JOINT STATUS REPORT IN RESPONSE TO ECF NO. 34

On May 28, 2024, the parties to the above captioned action filed their Stipulation to Stay Action in Its Entirety (ECF No. 33), requesting that this case be stayed as a result of Steward Health Care Systems, LLC and certain of its affiliates filing for Chapter 11 bankruptcy. *See In re: Steward Health Care System, LLC, et al.*, Case No. 24-90213 (Bankr. S.D. Tex.) (the "Steward Bankruptcy").

The Court, at ECF No. 34, stayed this action and further ordered the parties to submit a status report every 60 days. Accordingly, the parties hereby jointly submit this Fourth Joint Status Report in Response to ECF No. 34.

The Steward Bankruptcy is still pending and has not concluded. The stay has not been lifted with respect to Defendant de la Torre. With respect to Defendant Medical Properties Trust, Inc. ("MPT"), the parties agree that the claims against MPT were released pursuant to a global settlement agreement entered in the Steward Bankruptcy (the "Bankruptcy Settlement"), which was approved by the Bankruptcy Court on September 18, 2024 and took effect no later than November 20, 2024. Today, Plaintiff and Defendant MPT filed a Stipulation of Dismissal as to the claims against Defendant MPT. Moving forward, Plaintiff and Defendant de la Torre will submit these status reports every 60-days per the Court's order.

Dated: January 31, 2025 /s/Peter A. Moir

Peter A. Moir Texas Bar No. 14254500 peter.moir@morganlewis.com

MORGAN, LEWIS & BOCKIUS LLP

1717 Main Street, Suite 3200 Dallas, TX 75201-7347 Telephone: (214) 466-4000 Facsimile: (214) 466-4001

Charles L. Solomont*
Massachusetts Bar No. 557190
carl.solomont@morganlewis.com
Andrew J. Gallo*
Massachusetts Bar No. 645739
andrew.gallo@morganlewis.com
Michael C. Polovich,*
Massachusetts Bar No. 708139
michael.polovich@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP

One Federal Street Boston, MA 02110-1726 Telephone: (617) 341-7700 Facsimile: (617) 341-7701

*Admitted pro hac vice

Attorneys For Plaintiff Aya Healthcare, Inc.

/s/ London England (w/ permission)

GRAY REED & MCGRAW LLP

Scott Funk

State Bar No. 7550900

London England

State Bar No. 24110313

1601 Elm Street, Suite 4600

Dallas, Texas 75201

Telephone: (214) 954-4135 Facsimile: (214) 953-1332

Email: sfunk@grayreed.com

lengland@grayreed.com

KTBS LAW LLP

David M. Stern (pro hac vice)

California Bar No. 67697

Samuel M. Kidder (pro hac vice)

California Bar No. 284015

1801 Century Park East, 26th Floor Los Angeles, California 90067 Telephone: (310) 407-4000

Facsimile: (310) 407-9090

Email: <u>dstern@ktbslaw.com</u>

skidder@ktbslaw.com

Attorneys For Defendant Medical Properties Trust, Inc.

/s/ Will Thompson (w/ permission)

QUINN EMANUEL URQUHART & SULLIVAN LLP

Will Thompson

3100 McKinnon St, Suite 1125

Dallas, Texas 75201

Telephone: (469) 902-3600 Facsimile: (469) 902-3610

Email: willthompson@quinnemanuel.com

Attorneys For Defendant Ralph de la Torre

CERTIFICATE OF SERVICE

I certify that on January 31, 2025, the foregoing was filed and served using the Court's ECF system.

/s/ Peter A. Moir
Peter A. Moir